REMARKS

Independent claims 1, 7, and 13 are amended herein to explicitly recite that toggling the selection state of an entry does not remove the entry from the table. Support for this amendment is found in the Specification at paragraph 20, describing the group selection of C source code files in a directory, for subsequent copying or deletion. The selection process must obviously leave the selected files in the directory display, to enable such subsequent action. No new matter is added.

The Examiner rejected claims 1, 2, 5-8, 11-14, 17, and 18 under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,101,916 to Panot. "[A] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Panot fails to disclose every element of claims 1, 7, or 13.

Panot discloses a wearable mine database access program for use by mine removal operators and trainees. The database provides access to textual and graphic information on mines utilizing virtual reality technology to allow the operator free use of his or her hands. Panot discloses a method of selectively decimating a database by excluding from display all database records whose values in particular fields fail to match the values in corresponding fields selected by the user. That is, the system initially displays a list of all mines in the entire database. If the user selects, e.g., a "main use" field having a value of "antipersonnel," all mines whose "main use" field does not contain the value "antipersonnel" are immediately and automatically deleted from the display, leading only the antipersonnel mines for the user to peruse.

Those of skill in the software arts use the term "select" to indicate that one or more items are designated, and a subsequent action will be performed on them, not to indicate that all items not matching the selection criteria are deleted or excluded from view. For example, the selection of words, paragraphs, and the like in a word processor, the selection of cells in a spreadsheet, and the like are generally indicated by reverse-video. Actions performed on the selected elements – such as copy, cut, and paste – are so common that virtually all applications assign the same shortcut keys to the actions (e.g., ctrl-c, ctrl-x, and ctrl-v, respectively). This pervasive industry standard evidences the common conception that the "selection" of one or more elements means they are included in some internal list, and are indicated as selected, but are not deleted or excluded from view. In particular, paragraph 20 of the Specification inherently adopts this meaning of "select," in discussing actions a user may take subsequent to the selection of particular files in a directory listing. Accordingly, the application must be examined with of this interpretation of the term "select."

Nevertheless, independent claims 1, 7, and 13 are amended herein two explicitly recite toggling a selection state of certain entries without removing said entries from said table. In Panot, entries (records of mines) whose fields match the value of a selected field are completely removed from the mine listing. Accordingly, Panot does not toggle the selection state of such entries without removing them from the table, and cannot anticipate claims 1, 17, or 24. All claims depending therefrom include the limitations of their respective parent claims, and hence also defined patentable novelty over Panot.

The Examiner also rejected claims 1-18 under 35 U.S.C. § 102 as being anticipated by U.S. Patent Application No. 2004/0135807 to Pickering. Pickering also fails to disclose every

element of claims 1, 7, or 13. Pickering discloses a variety of means for selecting[1] a plurality of data fields and specifying a rule to be applied to the selected data fields. An icon indicating the rule is displayed, and the rule is applied to the selected data fields upon actuation. Pickering discloses that data fields that contain the same contents as an indicated data field may be selected (paragraph 0039, line 24), and that selecting or deselecting data fields may be a rule applied (paragraph 0041, lines 9 and 10). However, Pickering discloses only the selection or deselection of <u>data fields</u> – not table entries. Pickering is completely silent as to any hierarchical entity being comprised of data fields, and selecting the entity – as opposed to the data fields themselves – according to any of its disclosed selection methods.

Claims 1, 7, and 13 clearly recite a table comprising entries, each having one or more fields. The claims recite accepting the designation of a <u>data field</u> for a first entry, and toggling the selection state of all <u>entries,</u> the content of whose corresponding data field matches that of the first entry. It is the table entry that is selected, not its matching data field. This distinction is critical. The Pickering invention is useful for its stated purpose – easily altering the values of a large plurality of data fields in a database. In contrast, the present invention provides a means to select a plurality of entities – such as network transactions (Figure 3), files or directories in a directory listing (Figure 4), and the like – based on a common attribute, as indicated by the values of data fields in a tabular listing.

The Examiner rejected claims 3, 4, 9, 10, 15, and 16 under 35 U.S.C. § 103 as being unpatentable over Panot in combination with Pickering. First, these claims depend from claim 1, and include all limitations of claim 1. As discussed above, Panot fails to disclose the limitations of claim 1. Second, the Examiner has failed to articulate a legally sufficient motivation or
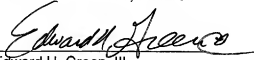
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[1] Using the proper meaning of that term – which does not include deleting.

suggestion for modifying the invention of Panot by the alleged teaching of Pickering. The Examiner stated such modification would be obvious since it "would enable a quick and efficient method to modify groups of data fields with simple actions." However, Panot is devoid of any suggestion of the need to modify groups of data fields of the UN mine database, and those of skill in the alert would readily recognize that the nature of the task Panot assists inherently teaches away from such modification. The only suggestion in Panot for any modification of the mine database is at col. 8, lines 49-50, "subsequent modification (creation of new mines, modifications, removal)." The creation of new mines and the removal of mines from the database do not require the modification of groups of data fields; they are inherently single-record operations. Similarly, it is extremely unlikely that a mine removal operator or trainee would make wholesale modifications to large numbers of records, hence "groups of data fields," mitigating the assertion that Panot suggests a need for any tool to do so. In short, Pickering is a solution to a problem inherently absent from any reasonable use of Panot's invention, and accordingly there is no motivation for the proffered modification.

The pending claims define patentable novelty and nonobviousness over Panot, Pickering, and the combination of the two. Accordingly, prompt allowance of all pending claims is respectfully requested.

Respectfully submitted,

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